

SHER TREMONTE LLP

April 8, 2022

VIA ECF

Hon. Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Yoel Abraham, et al.*, No. 20 Crim. 411 (RA)

Dear Judge Abrams:

We represent Yoel Abraham, a defendant in the above-referenced case. We write on behalf of the parties to request that the Court hold in abeyance the defendants' request for a subpoena to Amazon pursuant to Rule 17(c). Dkt. # 60. Counsel for all defendants join this request, and the government consents to the request.

Since the government filed its motion to quash, Dkt. # 61, the parties have engaged in productive discussions regarding the proposed subpoena. The government has advised that it is in the process of determining whether additional information responsive to certain of the subpoena's requests exists, a process that is likely to take an additional two-to-three weeks. Accordingly, we respectfully request that the Court hold the subpoena request in abeyance and we will provide the Court with an update at least one week before our next status conference.

With respect to the status conference currently scheduled for May 6, 2022, due to a scheduling issue, we respectfully request that the Court adjourn it to May 10 at a time convenient for the Court. We appreciate Your Honor's consideration.

Respectfully submitted,

/s/

Justine A. Harris

Noam Biale

Maya Brodziak

Attorneys for Yoel Abraham

Application granted.

SO ORDERED.



Hon. Ronnie Abrams

4/11/22

cc: All counsel (via ECF)